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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CAPACITORS
ANTITRUST LITIGATION

Master File No. 3:14-cv-03264-JD

**STIPULATION AND [PROPOSED]
PROTECTIVE ORDER**

WHEREAS these consolidated civil cases arise from allegations of conspiracy in violation of the Sherman Act, 15 U.S.C. § 1, with regard to certain capacitors;

WHEREAS attorneys for the government represent that there is an ongoing criminal investigation into antitrust violations in the capacitors industry by a grand jury in the Northern District of California; and

WHEREAS attorneys for the government have intervened in these proceedings for the limited purpose of seeking a discovery stay or protective order to protect interests in the conduct and resolution of the criminal investigation;

NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

1. There shall be no discovery in this case (including, without limitation, document requests, interrogatories, requests to admit, or depositions) of any party's or witness's communications with the United States or with the grand jury

investigating capacitors (including, but not limited to, the fact or existence of such communications), except by order of the Court upon good cause shown and consistent with governing law.

2. All formal discovery requests shall be served on the attorneys for the government in this matter at the same time that plaintiffs and defendants receive notice.

3. Plaintiffs, defendants, and the United States reserve the right to apply to the Court for further protective orders or discovery stays as deemed necessary.

Dated: April 2, 2015

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22 Pursuant to Civil L. R. 5-1(e)(3), I attest that concurrence in the filing of this document
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27 IT IS SO ORDERED.

28 DATED: _____

The Honorable James Donato
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